

# **EXHIBIT B**

**IN THE COURT OF COMMON PLEAS OF ALLEGHENY COUNTY,  
PENNSYLVANIA**

CHRISTOPHER LISOWSKI, on behalf of  
himself and all others similarly situated,

Plaintiffs,

v.

WALMART STORES, INC., t/d/b/a  
WALMART,

Defendant.

**CIVIL ACTION – CLASS ACTION**

No. GD-20-10605

**NOTICE OF SERVICE OF PLAINTIFFS'  
FIRST SET OF DISCOVERY REQUESTS  
DIRECTED TO DEFENDANT WALMART  
STORES, INC.**

**JURY TRIAL DEMANDED**

Filed on behalf of Plaintiffs:  
Counsel of Record for these Parties:

Frank G. Salpietro, Esquire  
Pa. I.D. No. 47154

Emily E. Town, Esquire  
Pa. I.D. No. 309881

Rothman Gordon, P.C.  
Firm I.D. 010  
310 Grant Street – Third Floor  
Pittsburgh, PA 15219  
(412) 338-1185 (telephone)  
(412) 246-1785 (facsimile)  
[fgsalpietro@rothmangordon.com](mailto:fgsalpietro@rothmangordon.com)

**(LEAD CLASS COUNSEL)**

Steffan T. Keeton, Esquire  
Pa. I.D. No. 314635

The Keeton Firm LLC  
10 South Commons – Suite 102  
Pittsburgh, PA 15212  
(888) 412-5291 (Ext. 711)  
[stkeeton@keetonfirm.com](mailto:stkeeton@keetonfirm.com)

**(CO-COUNSEL)**

**FILED**  
**20 OCT 13 AM 11:05**  
**DEPT. OF COURT RECORDS**  
**CIVIL/FAMILY DIVISION**  
**ALLEGHENY COUNTY PA**

IN THE COURT OF COMMON PLEAS OF ALLEGHENY COUNTY,  
PENNSYLVANIA

CHRISTOPHER LISOWSKI, on behalf of  
himself and all others similarly situated,

Plaintiffs,

v.

WALMART STORES, INC., t/d/b/a  
WALMART,

Defendant.

CIVIL ACTION – CLASS ACTION

No. GD-20-10605

**NOTICE OF SERVICE OF PLAINTIFFS' FIRST SET OF  
DISCOVERY REQUESTS DIRECTED TO DEFENDANT WALMART STORES, INC.**

PLEASE TAKE NOTICE that, on the 12<sup>th</sup> day of October, 2020, Plaintiffs served their First Set of Discovery Requests Directed to Defendant Walmart Stores, Inc., by regular mail to the following address:

Walmart Stores, Inc.  
702 SW 8<sup>th</sup> Street  
Bentonville, AR 72716

ROTHMAN GORDON, P.C.

By: 

Frank G. Salpietro, Esquire  
PA I.D. No. 47154

310 Grant Street  
Third Floor – Grant Building  
Pittsburgh, PA 15219  
(412) 338-1185 – (phone)  
(412) 246-1785 – (facsimile)  
[fgsalpietro@rothmangordon.com](mailto:fgsalpietro@rothmangordon.com)

Attorneys for Plaintiffs

**CERTIFICATE OF COMPLIANCE**

I certify that this filing complies with the provisions of the *Public Access Policy of the Unified Judicial System of Pennsylvania: Case Records of the Appellate and Trial Courts* that require filing confidential information and documents differently than non-confidential information and documents.

Submitted by: Plaintiffs

Signature: 

Name: Frank G. Salpietro

Attorney No.: 47154

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the within Notice of Service has been served upon Defendant at the address set forth below via regular mail this 12<sup>th</sup> day of October, 2020:

Walmart Stores, Inc.  
702 SW 8<sup>th</sup> Street  
Bentonville, AR 72716

By: 

Frank G. Salpietro, Esquire  
Attorneys for Plaintiffs

**IN THE COURT OF COMMON PLEAS OF ALLEGHENY COUNTY,  
PENNSYLVANIA**

CHRISTOPHER LISOWSKI, on behalf of  
himself and all others similarly situated,

Plaintiffs,

v.

WALMART STORES, INC., t/d/b/a  
WALMART,

Defendant.

CIVIL ACTION – CLASS ACTION

No. GD-20-10605

**NOTICE OF SERVICE OF PLAINTIFFS'  
SECOND SET OF DISCOVERY  
REQUESTS DIRECTED TO DEFENDANT  
WALMART STORES, INC.**

**JURY TRIAL DEMANDED**

Filed on behalf of Plaintiffs:  
Counsel of Record for these Parties:

Frank G. Salpietro, Esquire  
Pa. I.D. No. 47154

Emily E. Town, Esquire  
Pa. I.D. No. 309881

Rothman Gordon, P.C.  
Firm I.D. 010  
310 Grant Street – Third Floor  
Pittsburgh, PA 15219  
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Pittsburgh, PA 15212  
(888) 412-5291 (Ext. 711)  
[stkeeton@keetonfirm.com](mailto:stkeeton@keetonfirm.com)

**(CO-COUNSEL)**

**FILED**

**20 OCT 21 PM 3:19**

**DEPT. OF COURT RECORDS  
CIVIL/FAMILY DIVISION  
ALLEGHENY COUNTY PA**

IN THE COURT OF COMMON PLEAS OF ALLEGHENY COUNTY,  
PENNSYLVANIA

CHRISTOPHER LISOWSKI, on behalf of  
himself and all others similarly situated,

Plaintiffs,

v.

WALMART STORES, INC., t/d/b/a  
WALMART,

Defendant.

CIVIL ACTION – CLASS ACTION

No. GD-20-10605

**NOTICE OF SERVICE OF PLAINTIFFS' SECOND SET OF  
DISCOVERY REQUESTS DIRECTED TO DEFENDANT WALMART STORES, INC.**

PLEASE TAKE NOTICE that, on the 21<sup>st</sup> day of October, 2020, Plaintiffs served their Second Set of Discovery Requests Directed to Defendant Walmart Stores, Inc., by regular mail to the following address:

Walmart Stores, Inc.  
702 SW 8<sup>th</sup> Street  
Bentonville, AR 72716  
Attention: Legal Department

ROTHMAN GORDON, P.C.

By: 

Frank G. Salpietro, Esquire  
PA I.D. No. 47154

310 Grant Street  
Third Floor – Grant Building  
Pittsburgh, PA 15219  
(412) 338-1185 – (phone)  
(412) 246-1785 – (facsimile)  
[fgsalpietro@rothmangordon.com](mailto:fgsalpietro@rothmangordon.com)

Attorneys for Plaintiffs

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the within Notice of Service has been served upon Defendant at the address set forth below via regular mail this 21<sup>st</sup> day of October, 2020:

Walmart Stores, Inc.  
702 SW 8<sup>th</sup> Street  
Bentonville, AR 72716  
Attention: Legal Department

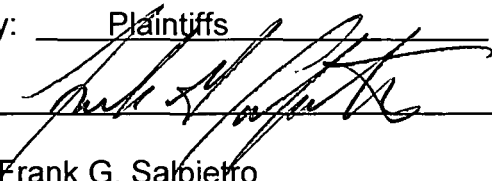
By: \_\_\_\_\_

  
Frank G. Salpietro, Esquire  
Attorneys for Plaintiffs



**CERTIFICATE OF COMPLIANCE**

I certify that this filing complies with the provisions of the *Public Access Policy of the Unified Judicial System of Pennsylvania: Case Records of the Appellate and Trial Courts* that require filing confidential information and documents differently than non-confidential information and documents.

Submitted by: Plaintiffs  
Signature:   
Name: Frank G. Salpietro  
Attorney No.: 47154

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CHRISTOPHER LISOWSKI, on behalf of  
himself and all others similarly situated,

Plaintiffs,

v.

WALMART STORES, INC., t/d/b/a  
WALMART,

Defendant.

CIVIL ACTION – CLASS ACTION

No. GD-20-10605

**AFFIDAVIT OF SERVICE**

**JURY TRIAL DEMANDED**

Filed on behalf of Plaintiffs:  
Counsel of Record for these Parties:

Frank G. Salpietro, Esquire  
Pa. I.D. No. 47154

Emily E. Town, Esquire  
Pa. I.D. No. 309881

Rothman Gordon, P.C.  
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**(LEAD CLASS COUNSEL)**

Steffan T. Keeton, Esquire  
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WALMART STORES, INC., t/d/b/a  
WALMART,

Defendant.

CIVIL ACTION – CLASS ACTION

No. GD-20-10605

**AFFIDAVIT OF SERVICE**

I, Frank G. Salpietro, Esquire, certify upon information and belief that Defendant Walmart Stores, Inc., t/d/b/a Walmart, was properly served on October 13, 2020, by serving an agent, manager, clerk or other person for the time being in charge of a regular place of business or activity of Defendant, as evidenced by the attached certified mail return receipt, pursuant to Pa. R.C.P. 404 and 403.

The above statement is true and correct to the best of my knowledge, information and belief. I understand that false statements contained herein are subject to the penalties of 18 Pa. C.S.A. § 4904 relating to unsworn falsification to authorities.

ROTHMAN GORDON, P.C.

By: /s/ Frank G. Salpietro  
Frank G. Salpietro

Attorneys for Plaintiff Christopher Lisowski, on  
behalf of himself and all others similarly  
situated

**U.S. Postal Service™**  
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For delivery information, visit our website at [www.usps.com](http://www.usps.com)®.

**PGS OFFICIAL USE**

Certified Mail Fee  
 \$

Extra Services & Fees (check box, add fee as appropriate)

<input type="checkbox"/> Return Receipt (hardcopy)	\$
<input type="checkbox"/> Return Receipt (electronic)	\$
<input type="checkbox"/> Certified Mail Restricted Delivery	\$
<input type="checkbox"/> Adult Signature Required	\$
<input type="checkbox"/> Adult Signature Restricted Delivery	\$

Postage  
 \$

Total Postage and Fees  
 \$

Sent To  
 Street and /  
 City, State, .

Walmart Stores, Inc.  
 702 SW 8<sup>th</sup> Street  
 Bentonville, AR 72716

PS Form 3800, April 2015 PSN 7530-02-000-9047 See Reverse for Instructions

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY		
<ul style="list-style-type: none"> <li>■ Complete items 1, 2, and 3.</li> <li>■ Print your name and address on the reverse so that we can return the card to you.</li> <li>■ Attach this card to the back of the mailpiece, or on the front if space permits.</li> </ul> <p>1. Article Addressed to:</p> <p>Walmart Stores, Inc.            702 SW 8<sup>th</sup> Street            Bentonville, AR 72716</p> <p>2. Article Number (Transfer from service label)            7019 1120 0000 5125 4145</p>	<p>A. Signature  <i>[Signature]</i></p> <p>B. Receiver's Name (Printed Name)  <i>[Name]</i></p> <p>C. Date of Delivery            OCT 13 2020</p> <p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes            If YES, enter delivery address below: <input checked="" type="checkbox"/> No</p> <p>3. Service Type</p> <table border="0"> <tr> <td> <input type="checkbox"/> Adult Signature  <input type="checkbox"/> Adult Signature Restricted Delivery  <input checked="" type="checkbox"/> Certified Mail®  <input type="checkbox"/> Certified Mail Restricted Delivery  <input type="checkbox"/> Collect on Delivery  <input type="checkbox"/> Collect on Delivery Restricted Delivery               </td> <td> <input type="checkbox"/> Priority Mail Express®  <input type="checkbox"/> Registered Mail™  <input type="checkbox"/> Registered Mail Restricted Delivery  <input checked="" type="checkbox"/> Return Receipt for Merchandise  <input type="checkbox"/> Signature Confirmation™  <input type="checkbox"/> Signature Confirmation Restricted Delivery               </td> </tr> </table>	<input type="checkbox"/> Adult Signature <input type="checkbox"/> Adult Signature Restricted Delivery <input checked="" type="checkbox"/> Certified Mail® <input type="checkbox"/> Certified Mail Restricted Delivery <input type="checkbox"/> Collect on Delivery <input type="checkbox"/> Collect on Delivery Restricted Delivery	<input type="checkbox"/> Priority Mail Express® <input type="checkbox"/> Registered Mail™ <input type="checkbox"/> Registered Mail Restricted Delivery <input checked="" type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Signature Confirmation™ <input type="checkbox"/> Signature Confirmation Restricted Delivery
<input type="checkbox"/> Adult Signature <input type="checkbox"/> Adult Signature Restricted Delivery <input checked="" type="checkbox"/> Certified Mail® <input type="checkbox"/> Certified Mail Restricted Delivery <input type="checkbox"/> Collect on Delivery <input type="checkbox"/> Collect on Delivery Restricted Delivery	<input type="checkbox"/> Priority Mail Express® <input type="checkbox"/> Registered Mail™ <input type="checkbox"/> Registered Mail Restricted Delivery <input checked="" type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Signature Confirmation™ <input type="checkbox"/> Signature Confirmation Restricted Delivery		

PS Form 3811, July 2015 PSN 7530-02-000-9053 Domestic Return Receipt

**U.S. Postal Service™**  
**CERTIFIED MAIL® RECEIPT**  
 Domestic Mail Only

For delivery information, visit our website at [www.usps.com](http://www.usps.com)®.

**FGS OFFICIAL USE**

Certified Mail Fee \$

Extra Services & Fees (check box, add fee as appropriate)

☐ Return Receipt (hardcopy) \$

☐ Return Receipt (electronic) \$

☐ Certified Mail Restricted Delivery \$

☐ Adult Signature Required \$

☐ Adult Signature Restricted Delivery \$

Postage \$

Total Po \$

Sent To Walmart Stores, Inc.  
 702 SW 8<sup>th</sup> Street  
 Bentonville, AR 72716

Street ar

City, Sta ATTENTION: LEGAL DEPARTMENT

PS Form 3811, July 2015 PSN 7530-02-000-9053 See Reverse for Instructions

OCT 13 2020  
 Postmark Here

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY
<ul style="list-style-type: none"> <li>Complete items 1, 2, and 3.</li> <li>Print your name and address on the reverse so that we can return the card to you.</li> <li>Attach this card to the back of the mailpiece, or on the front if space permits.</li> </ul>	<p>A. Signature</p> <p><i>[Signature]</i></p> <p><input type="checkbox"/> Agent</p> <p><input type="checkbox"/> Addressee</p> <p>B. Received by (Printed Name)</p> <p><i>[Signature]</i></p> <p>C. Date of Delivery</p> <p>OCT 13 2020</p> <p>If delivery address is different from item 1? <input type="checkbox"/> Yes</p> <p>If YES, enter delivery address below: <input checked="" type="checkbox"/> No</p>
<p>1. Article Addressed to:</p> <p>Walmart Stores, Inc.          702 SW 8<sup>th</sup> Street          Bentonville, AR 72716</p> <p>ATTENTION: LEGAL DEPARTMENT</p> <p>9590 9402 5137 9092 8107 39</p>	<p>3. Service Type</p> <p><input type="checkbox"/> Adult Signature</p> <p><input type="checkbox"/> Adult Signature Restricted Delivery</p> <p><input checked="" type="checkbox"/> Certified Mail®</p> <p><input type="checkbox"/> Certified Mail Restricted Delivery</p> <p><input type="checkbox"/> Collect on Delivery</p> <p><input type="checkbox"/> Collect on Delivery Restricted Delivery</p> <p><input type="checkbox"/> Priority Mail Express®</p> <p><input type="checkbox"/> Registered Mail™</p> <p><input type="checkbox"/> Registered Mail Restricted Delivery</p> <p><input checked="" type="checkbox"/> Return Receipt for Merchandise</p> <p><input type="checkbox"/> Signature Confirmation™</p> <p><input type="checkbox"/> Signature Confirmation Restricted Delivery</p>
<p>2. Article Number (Transfer from service label)</p> <p>7019 1120 0000 5125 4121</p>	<p>PS Form 3811, July 2015 PSN 7530-02-000-9053</p> <p>Domestic Return Receipt</p>

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the within Affidavit of Service has been served upon Defendant at the addresses set forth below via regular mail, this 28<sup>th</sup> day of October, 2020:

Walmart Stores, Inc.  
702 SW 8<sup>th</sup> Street  
Bentonville, AR 72716  
Attention: Legal Department

ROTHMAN GORDON, P.C.

By: /s/ Frank G. Salpietro  
Frank G. Salpietro, Esquire

Attorneys for Plaintiff Christopher Lisowski, on  
behalf of himself and all others similarly  
situated

**CERTIFICATE OF COMPLIANCE**

I certify that this filing complies with the provisions of the *Public Access Policy of the Unified Judicial System of Pennsylvania: Case Records of the Appellate and Trial Courts* that require filing confidential information and documents differently than non-confidential information and documents.

Submitted by: Plaintiffs

Signature: /s/ Frank G. Salpietro

Name: Frank G. Salpietro

Attorney No.: 47154